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May 12, 2023

Via CEF

United States Magistrate Judge Edward S. Kiel
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: John Doe v. Baila Sebrow
United States District Court, District of New Jersey
Case No.: 2:21-cv-20706

Dear Magistrate Kiel,

While I prefer not to litigate through correspondence, I must address the assertions in Mr. Heller's letter. There has never been a good-faith effort by his client to settle this case and still fails to remain one. Mr. Heller and Ms. Sebrow have ignored this litigation out of indifference rather than focusing on a "sensitive period of negotiations" as he claims. The DV case plaintiff has against Sebrow for her conduct has nothing to do with this matter and Mr. Heller is simply trying to delay the inevitable judgment against Ms. Sebrow for her harassment.

Respectfully submitted,

Daniel S. Szalkiewicz, Esq.

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